

JUDGE SWAN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA :

- v. - :

JOSE WILLIAMS, and  
MICHAEL HEYWARD :

Defendants. :

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INDICTMENT

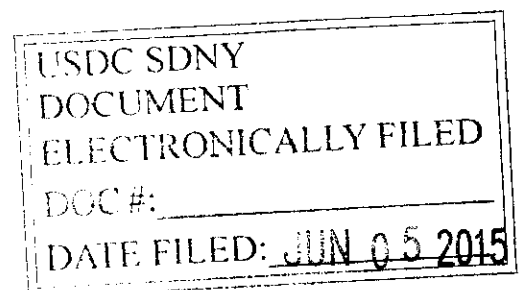
15 CRIM 341

COUNT ONE

The Grand Jury charges:

1. From in or about December 2014, up to and including in or about January 2015, in the Southern District of New York and elsewhere, JOSE WILLIAMS and MICHAEL HEYWARD, the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS and HEYWARD, and other individuals, known and unknown, committed armed robberies of employees at commercial establishments in and around Manhattan, Queens and Staten Island, New York, that were involved in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)



**COUNT TWO**

The Grand Jury further charges:

2. From in or about December 2014, up to and including in or about January 2015, JOSE WILLIAMS and MICHAEL HEYWARD, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, to wit, handguns, which handguns were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.).

**FORFEITURE ALLEGATIONS**

3. As the result of committing the robbery offense in violation of Title 18, United States Code, Section 1951, alleged in Count One of this Indictment, JOSE WILLIAMS and MICHAEL HEYWARD, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of one or more of the offenses alleged in Count One of this Indictment.

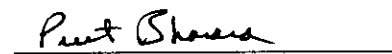
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. . . has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853, to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,  
Title 28, United States Code, Section 2461, and  
Title 18, United States Code, Section 1951,  
Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JOSE WILLIAMS and MICHAEL HEYWARD

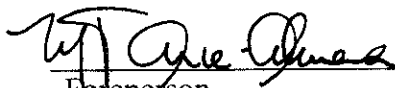
Defendants.

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INDICTMENT

15 Cr.

(18 U.S.C. §§ 924, 1951)

  
Foreperson

PREET BHARARA  
United States Attorney.

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6/5/15 -  
as

Filed Indictment  
Case assigned to Judge Sullivan.  
Judge Maas  
USMJ